

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JOHN RUDOLF,)	
)	
Plaintiff,)	Civil Action No. 19-1468
)	Magistrate Judge Maureen P. Kelly
v.)	
)	
AMERICAN INTERNATIONAL GROUP,)	
INC., NATIONAL UNION FIRE)	
INSURANCE COMPANY OF)	
PITTSBURGH, PA, and ALEXANDER)	
BAUGH,)	
)	
Defendants.)	

HEARING MEMO

HEARING HELD: Telephone Status Conference
DATE HEARING HELD: May 4, 2022
BEFORE: Magistrate Judge Maureen P. Kelly

Appearing for Plaintiff:
James B. Lieber, Esq.
Thomas M. Huber, Esq.

Appearing for Defendant:
Kevin B. Leblang, Esq.
Izabel P. McDonald, Esq.

Hearing began at 9:00 a.m.

Hearing concluded at 10:00 a.m.

Stenographer: None

OUTCOME:

1. Reviewed matters discussed at 4/14/22 status conference.
2. Deposition of Peter Zaffino was conducted.
3. Generally discussed Plaintiff's Motion to Compel Document Production and Supplemental Information, ECF No. 102, filed on May 2, 2022. Defendants are directed to file response by May 23, 2022. Response is limited to 19 pages. Plaintiff to file reply by June 3, 2022. The reply is limited to 19 pages. Court identified 3 categories of request to look at resolving, if possible.

4. Information provided as to possible interference with prospective employer. Alleged conduct and possible need for related discovery to be addressed after ruling on motion for summary judgment. Court addressed that there is to be no interference by Defendants with any prospective employers of Plaintiff.
5. Defendants intend to file motion for summary judgment on all claims. Discussed summary judgment deadlines. Scheduling order will be issued.
6. Counsel will work to obtain referenced medical records. Any issue can be addressed after motion for summary judgment ruled on.
7. Request by Defendants for fee agreement. Any issue can be addressed after motion for summary judgment ruled on.
8. Parties have agreed to address expert discovery after motion for summary judgment is ruled on.
9. Parties have agreed to address punitive damages discovery after motion for summary judgment is ruled on.
10. Remaining discovery issue addressed as to Defendants' response. Counsel are working through.
11. Court raised the possibility of return to mediation at this time. Case not to be referred back at this time. Defendants to provide a response to Plaintiff's most recent demand by 5/18/22. The Court encouraged the parties to seriously consider resolution at this time. Case will be referred to mediation following ruling on motion for summary judgment, as appropriate.